

EXHIBIT 10

From: Bundren, Brandon

Sent: Friday, January 26, 2024 1:44 PM

To: Patrick Sanders <patrick.sanders@macgilllaw.com>

Cc: Nokes, Scarlett <snokes@bradley.com>; Robert MacGill <robert.macgill@macgilllaw.com>; Scott Murray <scott.murray@macgilllaw.com>; Besen, Gene <gbesen@bradley.com>; Callas, Gretchen <GCALLAS@jacksonkelly.com>; Hurney, Jr., Thomas J. <THURNEY@jacksonkelly.com>; Steve Mintz <Mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>; John Jacobson <JJacobson@rjfirm.com>; Kathy Klein <KKlein@rjfirm.com>; Matt Pietsch <matt@tpmblaw.com>; Gino Marchetti <gmarchetti@tpmblaw.com>

Subject: RE: Hunt - follow-up

We will do our best. We can also talk later in the week at the depositions.

As for checking the box, that is fine if that is all you all think is required, but if it is the Plaintiff's (unreasonable) position that written discovery closes on Friday and motions must be filed on Friday, we need this information sooner so we can evaluate whether we need to move to compel. While we are moving to extend the deadlines and going to file the motion as unopposed, we need this information well-before the deadline expires, which should have been provided months ago.

R. Brandon Bundren

Partner | [Bradley](#)
bbundren@bradley.com
d: 615.252.4647

From: Patrick Sanders <patrick.sanders@macgilllaw.com>

Sent: Friday, January 26, 2024 8:25 AM

To: Bundren, Brandon <bbundren@bradley.com>

Cc: Nokes, Scarlett <snokes@bradley.com>; Robert MacGill <robert.macgill@macgilllaw.com>; Scott Murray <scott.murray@macgilllaw.com>; Besen, Gene <gbesen@bradley.com>; Callas, Gretchen <GCALLAS@jacksonkelly.com>; Hurney, Jr., Thomas J. <THURNEY@jacksonkelly.com>; Steve Mintz <Mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>; John Jacobson <JJacobson@rjfirm.com>; Kathy Klein <KKlein@rjfirm.com>; Matt Pietsch <matt@tpmblaw.com>; Gino Marchetti <gmarchetti@tpmblaw.com>

Subject: Re: Hunt - follow-up

Brandon,

We are happy to confer with you on the deposition topics. Could we get your objections today or Monday and set a call to discuss on Tuesday?

As you mentioned on the phone, supplementing the interrogatories in this situation is more of a box checking exercise because Plaintiff served his Amended Damages Statement on January 9. We will serve supplemental discovery responses shortly.

We look forward to your response on the document productions.

Best regards,

Patrick Sanders

Associate

MacGill PC

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On Thu, Jan 25, 2024 at 11:25 AM Bundren, Brandon <bbundren@bradley.com> wrote:

Patrick,

We will move to extend the deadline and file the motion as opposed. I ask that you, however, reconsider your client's position given the Magistrate Judge's statement about extending deadlines, especially in light of your client's belated and dilatory conduct in providing a \$100 million damages disclosures the day before the conference upon the precipice of our client seeking relief on that issue.

As I relayed to you on the phone, we are preparing objections and responses to the notice, and will identify the person who will testify for the EC on the topics where the EC will present a witness(es). I plan to get that to you early next week so we can meet and confer under Rule 30.

Separately, I will follow-up on the documents you referenced below and will get back to you promptly.

Finally, your client has still not supplemented his discovery responses per my email dated January 11 regarding his alleged \$100 million damage model. Please advise when we can expect to receive that, which we have been asking to be produced for months.

Thank you.

Brandon

R. Brandon Bundren

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From: Patrick Sanders <patrick.sanders@macgilllaw.com>
Sent: Thursday, January 25, 2024 10:09 AM
To: Bundren, Brandon <bbundren@bradley.com>
Cc: Nokes, Scarlett <snokes@bradley.com>; Robert MacGill <robert.macgill@macgilllaw.com>; Scott Murray <scott.murray@macgilllaw.com>
Subject: Re: Hunt - follow-up

Brandon,

We have discussed your request to extend all fact discovery and motions related to fact discovery to March 22. We do not consent to another discovery extension.

Attached is an amended 30(b)(6) deposition notice, which sets the Executive Committee 30(b)(6) deposition on February 20, 2024. Please confirm this date works for you and your representative(s).

Also, when will we be receiving documents from (1) the Executive Committee and (2) in response to our subpoenas to the Committee on Cooperation Members?

Best regards,

Patrick Sanders

Associate

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On Mon, Jan 22, 2024 at 10:55 AM Bundren, Brandon <bbundren@bradley.com> wrote:

Patrick,

Wanted to follow-up about our request to extend all fact discovery and motions related to fact discovery to March 22. Please let me know.

Thanks.

Brandon

R. Brandon Bundren

Partner

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